

FILED
JAMES BONINI
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

2008 MAY -6 P 6:01

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

UNITED STATES OF AMERICA

v.

Case No: **2:08 cr 081**

JUDGE **JUDGE GRAHAM**

KEITH S. HARDY (#1)
(Counts 1, 23 and 24)
DAVID J. MCREYNOLDS (#2)
a/k/a D.J.
(Counts 1 and 27)
EDMOND W. PLUNK (#3)
a/k/a Donta Wright
(Counts 1, 5 and 25)
MANDELL CANTRELL (#4)
(Count 1)
RONALD KELSOR (#5)
a/k/a Shorty
a/k/a OG
a/k/a Unc
(Counts 1, 4, 6-17 and 26)
BILLY C. LEE (#6)
a/k/a Bo Bo
(Count 1)
VICTOR WOODSON (#7)
a/k/a Slim
(Count 1)
EARNESTINE BANKSTON (#8)
a/k/a Earnie
(Count 1)
MITCHELL E. WOOD (#9)
a/k/a Mitch
(Count 1)
PAUL J. COON, JR. (#10)
a/k/a P.J.
(Counts 1 and 10)
SAMUEL R. GRAY (#11)
(Counts 1 and 6)
KRISTINE DIXON (#12)
a/k/a Krissy
(Counts 1, 3 and 13)
CHAD M. JORDAN (#13)
(Counts 1 and 7)
ROSEMARY STEWART (#14)
(Count 14)

I N D I C T M E N T

21 U.S.C. § 846
21 U.S.C. § 841(a) (1)
21 U.S.C. § 841(b) (1) (A)
21 U.S.C. § 841(b) (1) (C)
21 U.S.C. § 843(b)
21 U.S.C. § 844
21 U.S.C. § 853
28 U.S.C. § 2461(c)
18 U.S.C. § 924(d)

MARK DOWDY (#15)
(Counts 1 and 2)
KARESSA DIXON (#16)
(Counts 1 and 15)
WILFRED MURRAY (#17)
a/k/a Will
(Counts 1, 16 and 17)
CHARLES CARMICHAEL (#18)
a/k/a C.C.
(Counts 1 and 12)
KEITH HERDMAN (#19)
(Counts 1 and 11)
PATRICK DENNISON (#20)
a/k/a Pat
(Counts 1 and 8)
JUSTIN M. KNISLEY (#21)
(Count 18)
ANDREA HERDMAN (#22)
(Count 19)
MARY FRITZ (#23)
(Count 20)
PAUL ALLAN LARGE (#24)
a/k/a Alan
(Counts 1, 9 and 21)
CONSTANCE NASH (#25)
(Count 22)

THE GRAND JURY CHARGES THAT:

I. THE CONSPIRACY

COUNT ONE

A. CHARGE

Between in or about February 2008 through in or about the date of this Indictment, in the Southern District of Ohio, Eastern Division, and elsewhere,

KEITH S. HARDY,
DAVID J. MCREYNOLDS,
a/k/a D.J.,
(hereinafter referred to as DAVID J. MCREYNOLDS),
EDMOND W. PLUNK,

a/k/a Donta Wright,
(hereinafter referred to as EDMOND W. PLUNK),
MANDELL CANTRELL,
RONALD KELSOR,
a/k/a Shorty,
a/k/a OG,
a/k/a Unc,
(hereinafter RONALD KELSOR),
BILLY C. LEE,
a/k/a Bo Bo,
(hereinafter BILLY LEE),
VICTOR WOODSON,
a/k/a Slim,
(hereinafter VICTOR WOODSON),
EARNESTINE BANKSTON,
MITCHELL E. WOOD,
a/k/a Mitch,
(hereinafter MITCHELL WOOD),
PAUL J. COON, JR.,
a/k/a P.J.,
(hereinafter PAUL J. COON, JR.),
SAMUEL R. GRAY,
PAUL ALLAN LARGE,
a/k/a Allan,
(hereinafter PAUL ALLAN LARGE),
KRISTINE DIXON,
a/k/a Krissy,
(hereinafter KRISTINE DIXON),
CHAD M. JORDAN,
MARK DOWDY,
KARESSA DIXON,
WILFRED MURRAY,
a/k/a Will,
(hereinafter WILFRED MURRAY),
CHARLES CARMICHAEL,
a/k/a C.C.,
(hereinafter CHARLES CARMICHAEL),
KEITH HERDMAN,
PATRICK DENNISON,
a/k/a Pat,
(hereinafter PATRICK DENNISON),

the defendants herein, did knowingly, willfully and intentionally
conspire, confederate and agree with each other and with other

persons, known and unknown to the grand jury, to distribute and to possess with the intent to distribute more than 1000 grams of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A).

B. Manner and Means

1. It was part of the conspiracy that one or more of defendants would and did obtain quantities of heroin, break down the heroin into smaller distribution and/or user amounts, and distribute the heroin.

2. It was further part of the conspiracy that one or more of defendants would and did use telephones, some of which were subscribed to in other persons names and/or in fictitious names, to facilitate their illegal drug business and/or activities.

3. It was further part of the conspiracy that one or more of defendants would and did use coded language to discuss illegal drug transactions, including quantities of illegal drugs, prices of illegal drugs and/or payment for illegal drug transactions.

4. It was further part of the conspiracy that one or more of defendants would and did possess, carry, and/or use firearms in relation to their illegal drug activity, including to protect their illegal drugs and/or proceeds.

5. It was further part of the conspiracy that one or

more of defendants would and did utilize different residences and/or locations in relation to their illegal drug business and/or activities.

6. It was further part of the conspiracy that one or more of defendants would and did make statements and perform acts to hide and conceal and cause to be hidden and concealed the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of Title 21, United States Code, Section 846.

II. THE POSSESSION WITH THE INTENT TO DISTRIBUTE COUNTS

COUNT TWO

On or about February 19, 2008, in the Southern District of Ohio, Eastern Division,

MARK DOWDY,

the defendant herein, did knowingly, willfully and intentionally possess with the intent to distribute heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1)⁶.

COUNT THREE

On or about March 14, 2008, in the Southern District of Ohio, Eastern Division,

KRISTINE E. DIXON,

the defendant herein, did knowingly, willfully and intentionally possess with the intent to distribute heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)®.

COUNT FOUR

On or about April 21, 2008, in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,

the defendant herein, did knowingly, willfully and intentionally possess with the intent to distribute heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

On or about April 21, 2008, in the Southern District of Ohio, Eastern Division,

EDMOND W. PLUNK,

the defendant herein, did knowingly, willfully and intentionally possess with the intent to distribute more than 1000 grams of

heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (A).

III. THE TELEPHONE COUNTS

COUNT SIX

On or about February 8, 2008, at approximately 9:28 a.m., in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,
SAMUEL R. GRAY,

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVEN

On or about February 12, 2008, at approximately 2:45 p.m., in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,
CHAD M. JORDAN,

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate

the distribution of cyboxin, a Schedule III controlled substance, in that the defendants used a telephone to discuss in substance a quantity and the distribution of cyboxin.

In violation of Title 21, United States Code, Section 843(b).

COUNT EIGHT

On or about February 14, 2008, at approximately 11:06 a.m., in the Southern District of Ohio, Eastern Division,

**RONALD KELSOR,
PATRICK DENNISON,**

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT NINE

On or about February 26, 2008, at approximately 1:59 p.m., in the Southern District of Ohio, Eastern Division,

**RONALD KELSOR,
PAUL ALLAN LARGE,**

the defendants herein, did knowingly, willfully and intentionally

use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT TEN

On or about March 1, 2008, at approximately 1:59 p.m., in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,
PAUL J. COON, JR.,

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

On or about March 6, 2008, at approximately 12:41 p.m., in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,
KEITH HERDMAN,

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWELVE

On or about March 11, 2008, at approximately 1:06 p.m., in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,
CHARLES CARMICHAEL,

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity, the quality and

the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTEEN

On or about March 14, 2008, at approximately 12:46 p.m., in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,
KRISTINE E. DIXON,

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT FOURTEEN

On or about March 14, 2008, at approximately 3:26 p.m., in the Southern District of Ohio, Eastern Division,

RONALD KELSOR,
ROSEMARY STEWART,

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, in committing, causing and facilitating the distribution of heroin,

a Schedule I controlled substance, in that the defendants used a telephone to discuss the distribution of heroin by the defendants, which resulted in a heroin overdose death, and the efforts of the Columbus (Ohio) Division of Police to investigate said overdose death.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTEEN

On or about March 22, 2008, at approximately 9:02 p.m., in the Southern District of Ohio, Eastern Division,

**RONALD KELSOR,
KARESSA DIXON,**

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance the distribution and quality of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTEEN

On or about March 24, 2008, at approximately 12:14 p.m., in the Southern District of Ohio, Eastern Division,

**RONALD KELSOR,
WILFRED MURRAY,**

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the conspiracy to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the distribution of heroin.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTEEN

On or about March 24, 2008, at approximately 5:19 p.m., in the Southern District of Ohio, Eastern Division,

**RONALD KELSOR,
WILFRED MURRAY,**

the defendants herein, did knowingly, willfully and intentionally use a communication facility, that is, a telephone, to facilitate the distribution of heroin, a Schedule I controlled substance, charged in Count One of the Indictment, in that the defendants used a telephone to discuss in substance a quantity and the

quality of heroin.

In violation of Title 21, United States Code, Section 843(b).

IV. THE SIMPLE POSSESSION COUNTS

COUNT EIGHTEEN

On or about January 11, 2008, in the Southern District of Ohio, Eastern Division,

JUSTIN M. KNISLEY,

the defendant herein, did knowingly, willfully and intentionally possess heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844.

COUNT NINETEEN

On or about February 12, 2008, in the Southern District of Ohio, Eastern Division,

ANDREA HERDMAN,

the defendant herein, did knowingly, willfully and intentionally possess heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844.

COUNT TWENTY

On or about February 19, 2008, in the Southern District of Ohio, Eastern Division,

MARY FRITZ,

the defendant herein, did knowingly, willfully and intentionally possess heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844.

COUNT TWENTY-ONE

On or about March 5, 2008, in the Southern District of Ohio, Eastern Division,

PAUL ALLAN LARGE,

the defendant herein, did knowingly, willfully and intentionally possess heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844.

COUNT TWENTY-TWO

On or about March 5, 2008, in the Southern District of Ohio, Eastern Division,

CONSTANCE NASH,

the defendant herein, did knowingly, willfully and intentionally possess heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844.

V. FORFEITURE

COUNT TWENTY-THREE
FORFEITURE

1. The allegations of Count One of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

2. Upon conviction of the offense alleged in Count One of this Indictment, the defendant, **KEITH S. HARDY**, shall forfeit to the United States all firearms and ammunition involved in the commission of the offense, which were seized as a result of a search of the defendant's residence on or about April 19, 2008, including but not limited to the following:

A. a Keltec CNC, Inc., 9mm Luger semi-automatic pistol, serial number 121014.

In accordance with 18 U.S.C. §924(d) and 28 U.S.C. §2461(C).

COUNT TWENTY-FOUR
FORFEITURE

1. The allegations of Count One of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 21 U.S.C. §853.

2. As a result of the offense, alleged in Count One of the Indictment, Defendant, **KEITH S. HARDY**, shall forfeit to the

United States all property which is property constituting, or derived from, proceeds KEITH S. HARDY, obtained, directly or indirectly as a result of such violations and property used, or intended to be used, to commit, or to facilitate the commission of the violation described in Counts One of the Indictment, including but not limited to the following:

A. approximately \$10,200.00 in United States currency.

In accordance with 21 U.S.C. §853(a)(1) and §853(a)(2).

COUNT TWENTY-FIVE
FORFEITURE

1. The allegations of Count One of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 21 U.S.C. §853.

2. As a result of the offense, alleged in Count One of the Indictment, Defendant, EDMOND W. PLUNK, shall forfeit to the United States all property which is property constituting, or derived from, proceeds EDMOND W. PLUNK, obtained, directly or indirectly as a result of such violations and property used, or intended to be used, to commit, or to facilitate the commission of the violation described in Counts One of the Indictment, including but not limited to the following:

A. approximately \$53,630.00 in United States currency.

In accordance with 21 U.S.C. §853(a)(1) and §853(a)(2).

COUNT TWENTY-SIX
FORFEITURE

1. The allegations of Count One of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 21 U.S.C. §853.

2. As a result of the offense, alleged in Count One of the Indictment, Defendant, RONALD KELSOR, shall forfeit to the United States all property which is property constituting, or derived from, proceeds RONALD KELSOR, obtained, directly or indirectly as a result of such violations and property used, or intended to be used, to commit, or to facilitate the commission of the violation described in Counts One of the Indictment, including but not limited to the following:

A. approximately \$16,040.00 in United States currency.

In accordance with 21 U.S.C. §853(a)(1) and §853(a)(2).

COUNT TWENTY-SEVEN
FORFEITURE

1. The allegations of Count One of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

2. Upon conviction of the offense alleged in Count One of this Indictment, the defendant, DAVID J. MCREYNOLDS, shall forfeit to the United States all firearms and ammunition involved

in the commission of the offense, which were seized as a result of a search of the defendant's residence on or about April 19, 2008, including but not limited to the following:

- A. a Galena Industries, Inc., .45 caliber semi-automatic pistol, serial number DLX05626; and
- B. a .25 caliber semi-automatic pistol, serial number DXF40407.

In accordance with 18 U.S.C. §924(d) and 28 U.S.C. §2461(C).

A TRUE BILL,

Debra Plunk
Foreperson

GREGORY G. LOCKHART
United States Attorney

Robert C. Brichler
ROBERT C. BRICHLER
Chief, Organized Crime Drug Enforcement
Task Force

I CERTIFY THAT THIS IS A TITLE AND CORRECT COPY OF THE ORIGINAL FILED IN MY OFFICE ON <u>5/4/08</u> JAMES BOONIN, CLERK BY <u><i>Edmunds</i></u> Deputy Clerk DATE <u>5/7/08</u>	
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